



RICARDO R. MOREL, ESQ.  
Attorney at Law  
39-15 Main Street - Suite 318  
Flushing, New York 11354  
(424) 362-8960  
Esquire1998@gmail.com

---

November 12, 2018

Hon. Steven L. Tiscione  
United States Magistrate Judge  
United States District Court – Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**VIA ECF**

RE: Zhang v. Wai Realty Corp. et al  
**Case No. 1:18-cv-3189-FB-ST**

Dear Honorable Judge Tiscione:

I represent the Plaintiffs Yong Kai Zhang and Hai Chen Li in the above referenced matter.

Jointly with Defendants' counsel, Mr. Richard Apat, Esq., we respectfully write to inform the Court that we have reached a settlement in the controversy.

With regard to another case before you involving the same defendants (*Lu v. Compass* 16-cv-4753-ENV-ST), it happens that defendants' counsel in that case, Hang & Associates, has moved to withdraw. If it pleases the Court, Mr. Apat has agreed to represent the defendants in that case as well, in which we have also reached an agreement.

We respectfully request leave to submit a proposed settlement agreement, or agreements, for a *Cheeks* review and the Court's approval.

Respectfully yours,

/s/ Ricardo R. Morel  
Ricardo R. Morel, Esq.  
Attorney for Plaintiffs

ROSADO, APAT & DUDLEY LLP

By: /s/ Richard H. Apat  
Richard H. Apat, Esq.  
Attorneys for Defendants